

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAVID LEIBOWITZ, BENJAMIN  
LEIBOWITZ, JASON LEIBOWITZ, AARON  
LEIBOWITZ, and PINCHAS GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC.,  
TETHER HOLDINGS LIMITED, TETHER  
OPERATIONS LIMITED, TETHER  
LIMITED, TETHER INTERNATIONAL  
LIMITED, DIGFINEX INC., PHILIP G.  
POTTER, GIANCARLO DEVASINI,  
LUDOVICUS JAN VAN DER VELDE,  
REGINALD FOWLER, CRYPTO CAPITAL  
CORP., and GLOBAL TRADE SOLUTIONS  
AG,

Defendants.

Case No. 1:19-cv-09236 (KPF) (SN)

**DECLARATION OF CHRISTOPHER J. BEAL  
IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE**

I, CHRISTOPHER J. BEAL, being duly sworn, hereby depose and say as follows:

1. I am an attorney with the law firm of Dillon Miller & Ahuja, LLP, 5872 Owens Ave, Suite 200, Carlsbad, California 92008.

2. I submit this declaration in support of my motion for admission to practice *pro hac vice* as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited in the above-captioned action.

3. I am a member in good standing of the California Bar. My California Bar identification number is 216579 and a current certificate of good standing from the Supreme Court of California is attached to this Declaration as Exhibit A. I am also admitted to the United States District Courts for the Eastern, Central, Northern and Southern Districts of California, and the United States Court of Appeals for the Ninth Circuit.

4. I have never been convicted of a felony.

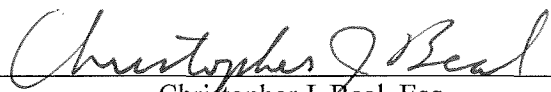
5. There are no pending disciplinary actions against me in any state or federal court.

6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore, upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 7, 2019  
Carlsbad, California

  
\_\_\_\_\_  
Christopher J. Beal, Esq.

# **EXHIBIT A**



# Supreme Court of California

JORGE E. NAVARRETE

*Clerk and Executive Officer of the Supreme Court*

## CERTIFICATE OF THE CLERK OF THE SUPREME COURT OF THE STATE OF CALIFORNIA

### CHRISTOPHER JAMES BEAL

*I, JORGE E. NAVARRETE, Clerk/Executive Officer of the Supreme Court of the State of California, do hereby certify that CHRISTOPHER JAMES BEAL #216579, was on the 4<sup>th</sup> day of December 2001, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 5<sup>th</sup> day of November 2019.*

JORGE E. NAVARRETE

*Clerk/Executive Officer of the Supreme Court*

By: \_\_\_\_\_

*Florentino Jiménez, Deputy Clerk*